## In The Matter Of:

JAMES D. SULLIVAN, et al. v. SAINT-GOBAIN PERFORMANCE PLASTICS CORPORATION

# EDWARD CANNING April 24, 2018

COVERING ALL UPSTATE NEW YORK



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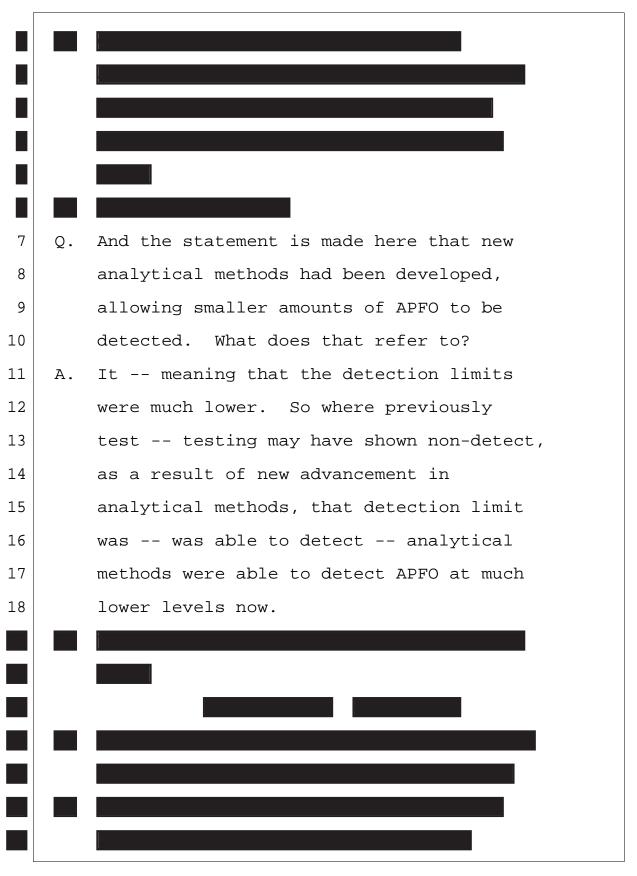
**EXHIBIT** 

5

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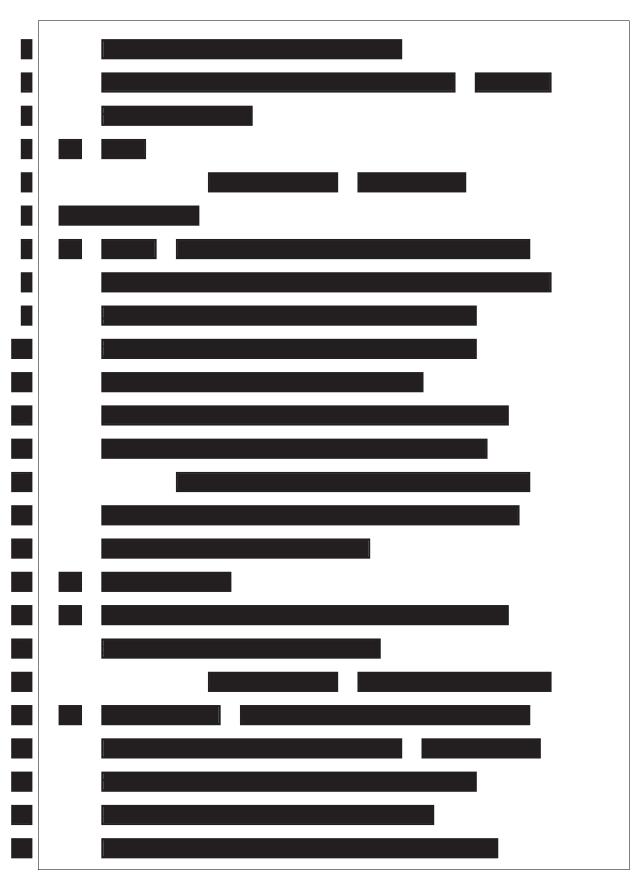
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1
    UNITED STATES DISTRICT COURT
2
    FOR THE DISTRICT OF VERMONT
3
4
    JAMES D. SULLIVAN and LESLIE ADDISON,
    WILLIAM S. SUMNER, JR., RONALD S. HAUSTHOR,
    GORDON GARRISON, and TED and LINDA CRAWFORD,
5
    individually, and on behalf of a Class of
    persons similarly situated,
6
7
                        Plaintiffs,
8
                             Civil Action No.:
        -against-
                              5:16-cv-000125-GWC
9
10
11
    SAINT-GOBAIN PERFORMANCE PLASTICS CORPORATION,
12
                        Defendant.
13
14
    Videotaped Deposition Of:
15
    EDWARD CANNING
16
    (Pursuant to Rule 30(b))
17
       SUBJECT TO AN AGREED-UPON PROTECTIVE ORDER
18
19
    DATE:
                   April 24, 2018
                   9:13 a.m. - 7:54 p.m.
20
    TIME:
2.1
    HELD:
                   HINKLEY ALLEN
                   30 South Pearl Street, Suite 901
22
                   Albany, New York 12207
23
    BEFORE:
                   Brenda J. O'Connor-Marello, CSR,
                   Certified Shorthand Reporter and
24
                   Notary Public in and for the
                   State of New York.
25
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1
    APPEARANCES:
2
    APPEARING FOR THE PLAINTIFF(S):
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        BY:
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    APPEARING FOR THE DEFENDANT(S):
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        -and-
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20
2.1
22
    Also Present:
23
          David Freedman, Videographer
24
25
```



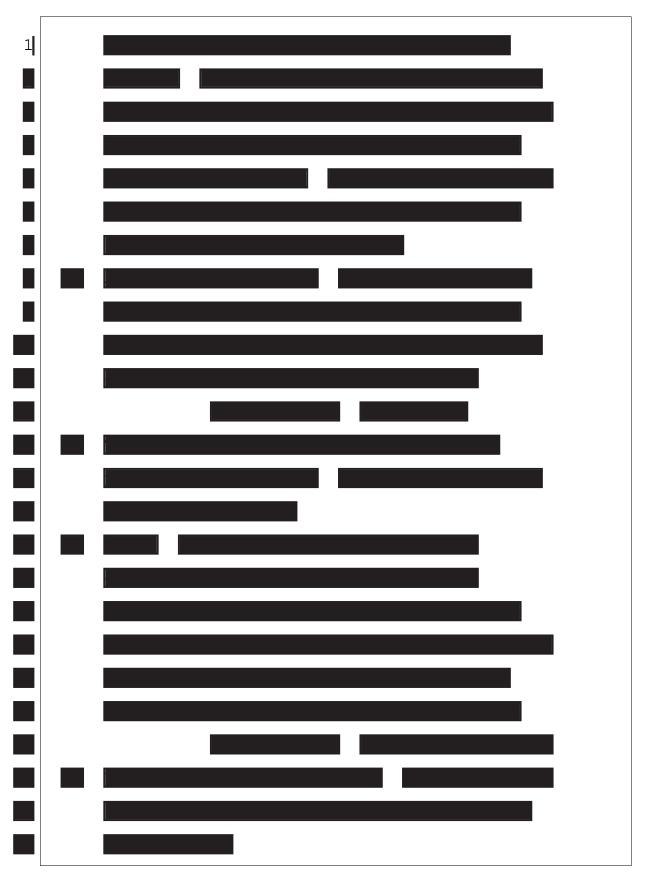


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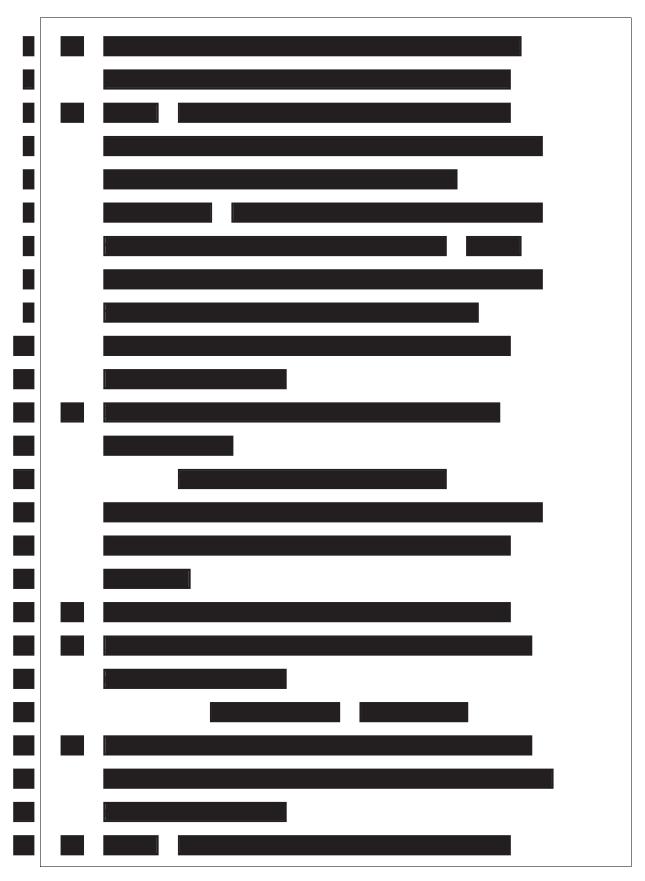
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241



2	Q.	Okay. And you can see a darker shaded
3		area. And I believe this is the arrow
4		was north up on this map; so it would be
5		to the west.
6	Α.	I yes. I recognize that.
7	Q.	And then I believe you called it Action
8		Area A?
9	A.	Corrective Action Area I.
10	Q.	Corrective Action Area I or
11	A.	One.
12	Q.	Okay. Thank you.
13		In that Corrective Action Area I,
14		Saint-Gobain has agreed to take
15		responsibility for providing a municipal
16		water supply; is that right?
17	Α.	Yes. That's correct.





6	Q. Okay.
7	A. That's correct.
8	MS. JOSELSON: Let me confer
9	with counsel for a minute.
10	THE WITNESS: Okay. Need to
11	leave the room?
12	MR. DAVIS: We'll walk out.
13	VIDEOGRAPHER: The time is 5:45.
14	We're off the record.
15	* * *
16	(A brief recess was taken.)
17	* * *
18	VIDEOGRAPHER: The time is 5:53.
19	This is DVD 4. We're on the record.
20	BY MR. DAVIS:
21	Q. Mr. Canning, I just have a few more
22	questions. I'm going to follow-up on some
23	things that I might not have asked
24	earlier, and then we'll end.